



April 15, 2013

Marlene H. Dortch  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

Re: *Vonage's Petition for Limited Waiver*, CC Docket No. 99-200, GN Docket No. 13-5

Dear Ms. Dortch:

Today, April 15, 2012, at 12:45 pm, the undersigned of this firm, on behalf of Vonage, spoke by phone with Michael Steffen, Legal Advisor to Chairman Genachowski, regarding the above-captioned dockets. This presentation made during the Sunshine period was "requested" by Mr. Steffen "for the clarification or adduction of evidence, or for resolution of issues" in this proceeding. 47 C.F.R. § 1.1204(a)(10)(iv). This presentation was thus exempt from the Sunshine period prohibition pursuant to Section 1.1203(a)(1) of the Commission's rules. 47 C.F.R. § 1.203(a)(1). This ex parte notice is thus today filed pursuant to Section 1.1206(b)(2)(v) of the Commission's rules.

During the call, I explained that Vonage seeks a waiver to permit it to access numbers directly rather than indirectly, not to expand the universe of numbers to which Vonage has access today. Thus, Vonage expects that any trial would be narrowly limited to ensure that it does not provide access to numbers in markets other than those where numbers are available indirectly through CLECs today.

Accordingly, it would be reasonable for the Commission to condition any waiver like the waiver requested by Vonage on the waiver recipient's receiving direct access to numbers only in markets (e.g., rate centers) where the waiver recipient (and others that access numbers indirectly) would have access to numbers through numbering partners.

If you have any questions or need any additional information, please do not hesitate to contact the undersigned at (202) 730-1346 or at [bstrandberg@wiltshiregrannis.com](mailto:bstrandberg@wiltshiregrannis.com).

Sincerely,

Brita D. Strandberg  
*Counsel to Vonage Holdings Corp.*

cc: Michael Steffen